

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN**

---

INTERNATIONAL BROTHERHOOD OF  
TEAMSTERS AIRLINE DIVISION,

Plaintiff,

Case No. 2:10-cv-00203-LA

v.

FRONTIER AIRLINES, INC. and  
REPUBLIC AIRWAYS HOLDINGS, INC.,

Defendants.

---

**DECLARATION OF NORMAN QUANDT IN SUPPORT OF DEFENDANTS' MOTION  
FOR PARTIAL STAY AND POSTING OF A BOND**

---

I, Norman A. Quandt, declare that the following is true and correct:

1. I am a partner in the law firm of Ford & Harrison LLP and am lead counsel for Defendants in the above captioned case.
2. During my 33 year career as a lawyer representing management in labor and employment matters I have primarily handled litigation. I have handled several hundred lawsuits at the trial and appellate level for the past decade almost exclusively in the area of Railway Labor Act, 45 U.S.C. §§ 151 et seq. I have been admitted to handle cases at one time or another in every United States Court of Appeal with the exception of the First Circuit.
3. I have prepared and/or reviewed my firm's bills in dozens of appellate cases in my career. Based on my extensive experience in these matters I would estimate that my law firm will end up charging Defendants approximately \$50,000 for our professional services handling the interlocutory appeal in this case. This estimate breaks down as follows:

--5 days of junior associate level work researching 7<sup>th</sup> Circuit authority setting forth standard for ruling on an interlocutory appeal, plus updating research on case law supporting representation dispute argument, plus "unclean hands" argument on appeal = \$7,500.

--10 days of senior associate/junior partner level work preparing initial draft of Appellate brief = \$20,000.

--10 days of partner level work editing and revising brief, preparing for and handling oral argument before 7<sup>th</sup> Circuit = \$22,500.

Grand total = \$50,000.

4. If anything, I believe these estimates are conservative. They also do not include the professional fees that local counsel will charge in connection with their assisting with this project.

Pusuant to 28 U.S.C. § 1746 I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: May 24, 2010.

A handwritten signature in black ink, appearing to read 'N. Quandt', written over a horizontal line.

Norman Quandt